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BEFORE THE ARIZONA CORPORAT

COMMISSIONERS
MARC SPITZER, CHAIRMAN
JIM IRVIN
WILLIAM MUNDELL
JEFF HATCH-MILLER
MIKE GLEASON

Arizona Corporation Commission

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AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR A
HEARING TO DETERMINE THE FAIR VALUE OF
THE UTILITY PROPERTY OF THE COMPANY FOR
RATEMAKING PURPOSES, TO FIX A JUST AND
REASONABLE RATE OF RETURN THEREON, TO
APPROVE RATE SCHEDULES DESIGNED TO
DEVELOP SUCH RETURN, AND FOR APPROVAL
OF PURCHASED POWER CONTRACT

Docket No. E-01345A-03-0437

MOTION TO INTERVENE

UniSource Energy Services ("UES"), through undersigned counsel, and pursuant to
A.A.C. R14-3-105, hereby moves the Arizona Corporation Commission ("Commission")
for an order allowing UES to intervene in the above captioned proceeding. In support
hereof, UES states as follows:

1. UES is a subsidiary of UniSource Energy Corporation. UES, through its
subsidiaries, UNS Electric, Inc. and UNS Gas, Inc. operates the Arizona electric and gas
systems formerly owned by Citizens Communications.¹

2. UES is directly and substantially affected by the issues to be addressed in this
proceeding for at least the following reasons:

- (i) APS is requesting recovery of the costs of generation units owned by it and/or one of its generation affiliates Pinnacle West Energy Corporation ("PWEC"). UES has received, and will receive electric generation service from APS and/or its affiliates. UES is currently negotiating a purchase power agreement with APS and/or its generation affiliates. UES

¹ UES and UNS Electric, Inc. shall be collectively referred to hereinafter as "UES."

1 believes that how the Commission determines the cost
2 recovery of the generation units could have an impact on the
3 rates and charges that it is able to negotiate with APS and/or
4 its generation affiliates; and

- 5 (ii) APS has raised issues regarding the recovery of costs
6 prudently incurred in order to comply with the Electric
7 Competition Rules. UES has also incurred costs in order to
8 comply with the Electric Competition Rules. The
9 Commission's deliberation and resolution of these issues will
10 affect UES' treatment and recovery of these costs.

11 3. No other party could adequately represent the interests of UES. UES'
12 involvement in this case will not broaden the issues of APS' application, nor will it unduly
13 prejudice APS or any other interested persons.

14 4. Service of all correspondence, documents or pleadings should be made to
15 counsel for UES as follows:

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17 Laura Schoeler, Esq.
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25 and

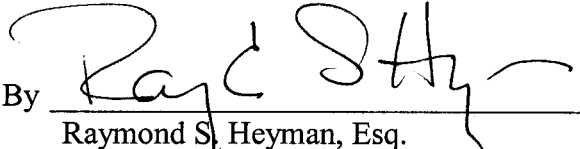
26 Deborah R. Scott, Esq.
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1 WHEREFORE, for all the foregoing reasons, UniSource Energy Services
2 respectfully requests that the Presiding Hearing Officer issue an order granting this Motion
3 to Intervene.
4

5 RESPECTFULLY SUBMITTED this 18th day of September, 2003.

6 **ROSHKA HEYMAN & DeWULF, PLC**

7
8 By 
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18 **ORIGINAL + 13 COPIES** of the foregoing
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24 September 18, 2003 to:

25 Marc Spitzer, Chairman
26 Jim Irvin, Commissioner
27 William A. Mundell, Commissioner
Jeff Hatch-Miller, Commissioner
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